

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

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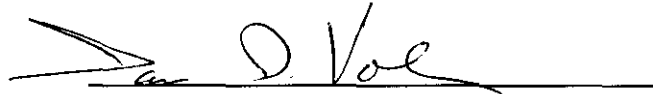
Mailing Online Services

Docket No. MC98-1

**RESPONSES OF PITNEY BOWES TO
REQUEST FOR ADMISSIONS OF USPS (USPS/PB-1)**

Pitney Bowes Inc. ("PB") hereby responds to the Request for Admissions of the Postal Service. In order to meet the response schedule agreed upon by counsel to the parties, the response is being faxed to the Postal Service. The question is set forth and is followed by the response.

Respectfully submitted,



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September 9, 1998



USPS/PB-1. With respect to mailpieces created via the DirectNET service described in the testimony of witness Brand,

- a. admit that Pitney Bowes can enter mail at discounted rates of postage under the existing Domestic Mail Classification Schedule (DMCS);
- b. admit that Pitney Bowes does enter some mail at discounted rates of postage under the existing DMCS;
- c. admit that Pitney Bowes does enter some mail at rates of postage more deeply discounted than those requested for use with Mailing Online market test service.

Responses:


(a) Pitney Bowes admits that it may lawfully enter mail at discounted rates of postage under the existing Domestic Mail Classification Schedule ("DMCS"), so long as the volume and other discount preparation requirements of the existing DMCS are satisfied. Pitney Bowes cannot enter mail that does not qualify for discounted rates under the existing DMCS at a discount as the Postal Service proposes to do for its Mailing Online customers.

(b) Admitted.

(c) Admitted. However, Pitney Bowes does not understand the Postal Service's classification change associated with Mailing Online to preclude it from entering "some mail at rates of postage more deeply discounted" than those proposed with the classification change, so long as the mail otherwise qualifies for such deeper discounts under the existing DMCS.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the United States Postal Service in this proceeding in accordance with sections 12 and 20(c) of the rules of practice.



Ian D. Volner